IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

VALERIE W. WAKEFIELD and HAROLD I. WAKEFIELD, husband and)	CIVIL DIVISION
wife,))	Civil Action No. 05 CV 79 – Erie
Plaintiffs,))	Honorable Maurice B. Cohill, Jr.
v .))	
JOY MINING MACHINERY)	JURY TRIAL DEMANDED
COMPANY, a division of Harnischfeger)	
Industries, and LARRY MEADE,)	
Defendants.)	

NOTICE OF DEPOSITION

To: Edie Sutton, Esquire
SUTTON LEGAL SERVICES
11 Sunset Court
Cranberry Township, PA 16066

Alexander H. Lindsay, Jr., Esquire THE LINDSAY LAW FIRM, P.C. 128 South Main Street Butler, PA 16001

Attorneys for Plaintiff, Valerie Wakefield

Please take notice that the deposition of Valerie Wakefield will be taken for the purposes of discovery and use at trial, pursuant to the Federal Rules of Civil Procedure, before a Notary Pubic duly authorized by law to administer oaths on Tuesday, June 27, 2006 at 10:00 a.m., and continuing thereafter as necessary, at the offices of Pietragallo, Bosick & Gordon LLP, The Thirty-Eighth Floor, One Oxford Centre, Pittsburgh, PA

EXHIBIT

15219 at which time you are invited to appear and take such part as shall be fitting and proper.

You are requested to bring with you any and all documents in your possession relating to your claims made in this matter.

The deposition will be recorded by a stenographer for a written transcript.

Respectfully submitted,

PAMELA G. COCHENOUR, ESQUIRE

Pa. I.D. #47761

PIETRAGALLO, BOSICK & GORDON

Firm #834

The Thirty-Eighth Floor

One Oxford Centre

Pittsburgh, PA 15219

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing NOTICE OF DEPOSITION was served this 19th day of May, 2006 via First Class Mail, Postage Pre-Paid, to the following:

> Edie Sutton, Esquire SUTTON LEGAL SERVICES 11 Sunset Court Cranberry Township, PA 16066

Alexander H. Lindsay, Jr., Esquire THE LINDSAY LAW FIRM, P.C. 128 South Main Street Butler, PA 16001 Attorneys for Plaintiff, Valerie Wakefield

> PAMELA G. COCHENOUR, ESQUIRE Pa. I.D. #47761

> PIETRAGALLO, BOSICK & GORDON Firm #834 The Thirty-Eighth Floor One Oxford Centre Pittsburgh, PA 15219

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wife,) Civil Action No. 05 CV 79 – Erie
Plaintiffs,) Honorable Maurice B. Cohill, Jr.
V)
JOY MINING MACHINERY COMPANY, a division of Harnischfeger Industries, and LARRY MEADE,) JURY TRIAL DEMANDED)
Defendants.)

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> Alexander H. Lindsay, Jr., Esquire THE LINDSAY LAW FIRM, P.C. 128 South Main Street Butler, PA 16001

Attorneys for Plaintiff, Valerie Wakefield

Please take notice that the deposition of Harold Wakefield will be taken for the purposes of discovery and use at trial, pursuant to the Federal Rules of Civil Procedure, before a Notary Pubic duly authorized by law to administer oaths on Monday, June 26, 2006 at 10:00 a.m., and continuing thereafter as necessary, at the offices of Pietragallo, Bosick & Gordon LLP, The Thirty-Eighth Floor, One Oxford Centre, Pittsburgh, PA

15219 at which time you are invited to appear and take such part as shall be fitting and proper.

You are requested to bring with you any and all documents in your possession relating to your claims made in this matter.

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The deposition will be recorded by a stenographer for a written transcript.

Respectfully submitted,

PAMELA G. COCHENOUR, ESQUIRE

Pa. I.D. #47761

PIETRAGALLO, BOSICK & GORDON

Firm #834

The Thirty-Eighth Floor

One Oxford Centre

Pittsburgh, PA 15219

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> Edie Sutton, Esquire SUTTON LEGAL SERVICES 11 Sunset Court Cranberry Township, PA 16066

Alexander H. Lindsay, Jr., Esquire THE LINDSAY LAW FIRM, P.C. 128 South Main Street Butler, PA 16001 Attorneys for Plaintiff, Valerie Wakefield

PAMELA G. COCHENOUR, ESQUIRE

Pa. L.D. #47761

PIETRAGALLO, BOSICK & GORDON Firm #834 The Thirty-Eighth Floor One Oxford Centre Pittsburgh, PA 15219